

# **EXHIBIT A**

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**From:** Armstrong, Scott (CRM) [REDACTED]  
**Sent:** Thursday, July 13, 2023 1:49 PM  
**To:** Cordova, Laura  
**Cc:** Liolos, John (CRM); Carter III, Thomas (USATXS); Murtha, Michael; [REDACTED]  
**Subject:** RE: US v. Hennessey - Discovery

**\*\*RECEIVED FROM EXTERNAL SENDER – USE CAUTION\*\***

We are around

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**From:** Cordova, Laura [REDACTED]  
**Sent:** Thursday, July 13, 2023 2:48 PM  
**To:** Armstrong, Scott (CRM) [REDACTED]  
**Cc:** Liolos, John (CRM) [REDACTED]; Carter III, Thomas (USATXS) [REDACTED]; Murtha, Michael [REDACTED]  
**Subject:** [EXTERNAL] Re: US v. Hennessey - Discovery

Scott,  
All emails and attached documents are definitely Jencks. Please let us know your availability to discuss.  
Laura

Laura Cordova  
[REDACTED]

On Jul 13, 2023, at 2:45 PM, Armstrong, Scott (CRM) [REDACTED] wrote:

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We believe that we attached all of the relevant exhibits. If you think we are wrong, please let us know which emails don't have attachments by way of example. We are not going to chase issues that we don't believe exist.

As to your other point, drafts are not Jencks. Feel free to bring it to the Court's attention.

Thanks,

Scott

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**From:** Cordova, Laura [REDACTED]  
**Sent:** Thursday, July 13, 2023 2:43 PM  
**To:** Armstrong, Scott (CRM) [REDACTED]  
**Cc:** Liolos, John (CRM) [REDACTED]; Carter III, Thomas (USATXS) [REDACTED]; Murtha, Michael [REDACTED]  
**Subject:** [EXTERNAL] Re: US v. Hennessey - Discovery

Scott,

You can identify the emails missing attachments, and please do so. It is your obligation to produce these, not ours to identify what's missing for you.

Also, Jencks covers any email, including all attached drafts, by any person who will testify. Every request below has a solid legal basis, and it's not appropriate or useful to delay production. Please produce these so that we don't have to bother the court with this. We are available and happy to discuss.

Thanks,  
Laura

Laura Cordova  
[REDACTED]

On Jul 13, 2023, at 2:08 PM, Armstrong, Scott (CRM) [REDACTED]  
wrote:

**\*\*RECEIVED FROM EXTERNAL SENDER – USE CAUTION\*\***

Counsel,

Please see our responses to your below points:

1. Please let us know which produced emails you believe do not have their attachments, and we can check for you. We tried to be as comprehensive as possible in this respect.
2. We believe this request is without legal authority.
3. We understand our discovery obligations. No materials will be produced at this time.
4. We understand our discovery obligations. No materials will be produced at this time.
5. We believe this request is without legal authority.
6. We redacted attorney statements to the extent included in any email productions. That is the basis for any redactions. We will not be providing a log.

Thanks,

Scott

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**From:** Cordova, Laura [REDACTED]  
**Sent:** Wednesday, July 12, 2023 12:03 PM  
**To:** Armstrong, Scott (CRM) [REDACTED]; Liolos, John (CRM)  
[REDACTED]; Carter III, Thomas (USATXS) [REDACTED]  
**Cc:** Murtha, Michael [REDACTED]  
**Subject:** [EXTERNAL] US v. Hennessey - Discovery

Counsel,

On July 10, 2023, we received the government's production that was supposed to include all "*Brady* material, *Giglio* material, and witness statements," which the government was required to produce on July 7, 2023. Upon review, it is apparent that the production is incomplete. We request immediate production of the following:

1. All email attachments – regardless of whether the document is directly attached or linked to the email;
2. All drafts of and correspondence regarding the search warrants, indictments, expert reports, and any other drafts created or sent by any potential witness;
3. Grand jury testimony of any witness who may testify;
4. Grand jury transcripts that includes any *Brady* or *Giglio* material, including any misstatement of the law or facts, including but not limited to any transcript that fails to disclose Mr. Hennessey's full tweets, including his Twitter disclaimers;
5. All SEC materials related to each stock listed in the government's June 15 expert disclosure; and
6. A privilege log for all redactions.

We are happy to discuss. If you would like to set up a call, please let us know some convenient times.

Best regards,  
Laura

**Laura M. Kidd Cordova**



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